

# COFFEY | BURLINGTON

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*Via CM/ECF*

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The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

RE: *United States v. Kozel*, Case No. 19-cr-460-KMW  
Motion for Modification of Bond

Dear Judge Wood:

The purpose of this letter is to obtain modification of bond for Defendant Todd Kozel. Specifically, the defense requests that Mr. Kozel be allowed to travel to a home owned by his father outside Harrison, Idaho. His travel arrangements for the trip to his father's home include a flight to Spokane, Washington, and the remainder of the trip by car. His return date is September 15, 2020.

Mr. Kozel's Pretrial Services Officer, Madalyn Toledo, and Assistant United States Attorneys Louis Pellegrino and Olga Zverovich have no objection to this request.

We ask that you endorse this letter confirming modification.

Respectfully submitted,

*/s/Kendall B. Coffey*

Kendall B. Coffey  
*Counsel for Todd Kozel*

cc: Louis Pellegrino, AUSA  
Olga Zverovich, AUSA  
Madalyn Toledo, U.S. Pretrial Services